

Merrimack Education Center

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January 30, 2019

Ms. Marlene H. Dortch
Secretary Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: CC Docket No. 02-6: In the Matter of Request for Waiver of Invoice Extension Deadline:

FCC Form 471 Application Number:	161032913
Funding Request Number:	1699070239
Worcester Public Schools	BEN#: 120307
Form 474#: 2864718 Denied Funding	

Service Provider: Merrimack Education Center

SPIN: 143004624
114 Turnpike Road, Suite #3
Chelmsford, MA 01824

Contact: Sharon Grover-Renda
Director of Compliance
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This is a **letter of appeal** being submitted by Merrimack Education Center, dba Addition Networks, for an invoice deadline extension waiver request and/or reversal of USAC's denial of funding for an approved appeal (RFCDL | September 18, 2018). Please refer to the following history:

- 9/18/2018: Attachment: [MEC_RFCDL_1699070239] indicated that *"the appeal is approved, and you have 30 days from the date of this notification to submit a new invoice."*
- 9/21/2018: Invoice #: 2864718 was submitted on 9/21/2018 and was denied based on USAC's correspondence: *"Invoice Received Date (9/21/2018) Later Than FCC Extension Date (8/2/2018)."*

- Attachment: [MEC_Case History_249218]
 - 9/24/2018: Submitted Customer Service Case #249218 to USAC CSB indicating that the appeal was approved after the FCC Extension Date and should be paid by USAC.
 - 9/25/2018: Received correspondence from CSB Rep, Danielle S., that *"We have escalated your case to USAC customer service management for a response."*
 - 10/12/2018: Contacted the CSB and received correspondence from CSB Rep, Derrick H., that *"Your question or concern has been escalated to management."*
 - 11/9/2018: Contacted the CSB for a status update on this outstanding issue.
 - 12/5/2018: Received correspondence from CSB indicating that *"Invoice 2864718 was rejected, on 10/31/2018 it appears that your invoice deadline was extended to 11/16/2018 "by" no new invoices were submitted. At this time you will need to file an invoice deadline waiver with the FCC."*

Please Note: Merrimack Education Center has **no record** of any USAC correspondence or EPC notification that this invoice deadline was extended to 11/16/2018. Merrimack Education Center did follow USAC's guidance for submitting an invoice within 30 days from receiving the RFCDL. If Merrimack Education Center had received timely responses from the CSB and/or an EPC notification regarding an updated deadline, we would have resubmitted the invoice.

Additionally, we cite the FCC Order DA-18-188 (February 26, 2018) regarding the USAC issues related to FY16 recurring charges and its relevance to our request for waiver. We thereby request your consideration in reversing the USAC decision to deny the SPI invoice Form 474 #: 2864718 and grant a waiver for an invoice extension, so we can file an additional invoice and receive reimbursement for \$5,157.00.

Thank you for your assistance in this matter.

Respectfully Submitted,



Sharon Grover-Renda
Director of Compliance